

UNITED STATES OF AMERICA	*	IN THE
Plaintiff	*	UNITED STATES
v.	*	DISTRICT COURT
RAMIREZ D. RODRIGUEZ	*	OF MARYLAND
Defendant	*	VIOLATION NOS:
	*	7281526-7281528

* * * * *

MOTION FOR DISCOVERY

The Defendant, RAMIREZ D. RODRIGUEZ, by and through his attorneys, Peter S. O'Neill and Murnane & O'Neill, hereby moves this Honorable Court for a pre-trial order granting discovery and other relief and in support thereof, the following is averred:

1. That the Government has not provided voluntary discovery which prevents the Defendant from successfully presenting a defense in the above-captioned case.

2. That the Defendant requests that the government be directed to furnish to him the discovery materials as hereinafter stated:

A. Any relevant written or recorded statements made by the Defendant, or copies thereof, within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government;

B. That portion of any written records containing the substance of any relative oral statement made by the Defendant whether before or after the arrest in response to interrogation by any person then known to the Defendant to be a

government agent;

C. Any recorded testimony of the Defendant before a Grand Jury which relates to the offense charged.

D. The substance of any other relevant oral statement made by the Defendant whether before or after the arrest in response to interrogation by any person then known by the Defendant to be a government agent and the government intends to use that statement at trial.

E. A copy of the Defendant's prior criminal record, if any, as is within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government.

F. Copies of any photographs, books, papers, documents, tangible objects, buildings or places, or other copies or portions thereof which are within the possession, custody or control of the government and which are material to the preparation of the Defendant's defense, or are intended for the use by the government as evidence in chief at the trial, or were obtained from or belonging to the Defendant.

G. Copies of any results or report of physical or mental examinations and/or scientific tests or experiments, or copies thereof, which are within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government, and which are material to the preparation of the defense or intended for use by the government as evidence in

chief at the time of trial.

H. All memorandum by investigating agents of the government in which the Defendant is mentioned.

WHEREFORE, the Defendant requests this Court.

a. To direct the government to produce the discovery materials and information requested herein for inspection and copying by the Defendant and her Counsel;

b. For an Order setting a date upon which production of the materials and information set forth herein shall be made by the government; and

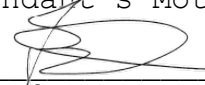
c. For an Order requiring the government to supplement its production of discovery materials upon discovery by it of additional evidence, information and materials.



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REQUEST FOR HEARING PURSUANT TO RULE 6

A hearing is requested on the Defendant's Motion.



PETER S. O'NEILL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 22, 2019 a copy of the foregoing Entry Of Appearance was sent via electronic filing using the PACER System to the United States Attorney, United States Attorney's Office.



PETER S. O'NEILL